

The Honorable Tana Lin

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

ERIKA E. VAIL, an individual,
Plaintiff,

v.

LINEAGE LOGISTICS, LLC, a Limited
Liability Company, LINEAGE LOGISTICS
SERVICES, LLC, a Limited Liability
Company, LINEAGE LOGISTICS, PFS, LLC,
a Limited Liability Company,
Defendants.

Case No. 2:22-cv-01775-TL

**STIPULATED MOTION TO STAY
FEDERAL ACTION PENDING
COMPLETION OF THE
ARBITRATION AND ~~PROPOSED~~
ORDER**

Noted on Motion Calendar:
Tuesday, February 28, 2023

Plaintiff ERIKA E. VAIL and Defendants LINEAGE LOGISTICS, LLC, LINEAGE LOGISTICS SERVICES, LLC, and LINEAGE LOGISTICS, PFS, LLC (“Defendants” and together with Plaintiff, “the Parties”), by and through their respective counsel of record, hereby move this Court pursuant to 9 U.S.C. § 3 for an order staying the case pending completion of arbitration. In support of this motion, the Parties state the following:

1. On December 15, 2022, Plaintiff initiated the instant lawsuit in the Western District of Washington. (ECF 1).

2. Plaintiff’s Complaint for Damages and Jury Demand (“Complaint”) asserts claims against Defendants for discrimination and wrongful termination based on sex and/or gender, arising out of and relating to her employment with Defendant Lineage Logistics, LLC.

3. On January 30, 2023, Defendants notified Plaintiff, through counsel, that Plaintiff

1 and Defendant Lineage Logistics, LLC had entered into an arbitration agreement (identified as
 2 “Mutual Arbitration Agreement”) executed by Plaintiff on August 19, 2022. The claims asserted
 3 in Plaintiff’s Complaint fall within the scope of the Mutual Arbitration Agreement.

4 4. Plaintiff agrees to proceed to arbitration on her claims pursuant to the Mutual
 5 Arbitration Agreement and to stay this federal action pending the completion of arbitration.

6 5. It is respectfully submitted that the interests of justice, including the promotion of
 7 judicial economy, will be served by staying the above action pending a final arbitration hearing.

8 THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and Defendants:

9 1. That Plaintiff, in accordance with the Mutual Arbitration Agreement, proceed to
 10 arbitrate her claims set forth in her Complaint, and that the federal action be stay pending
 11 completion of the arbitration.

12 STIPULATED this 28th day of February, 2023.

13
 14 /s/ Mark K. Davis

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Attorneys for Defendants

~~PROPOSED~~ ORDER

PURSUANT TO THE PARTIES’ STIPULATION, IT IS SO ORDERED.

DATED this 2nd day of March 2023.



Tana Lin

United States District Judge

STIPULATED MOTION TO STAY PENDING ARBITRATION AND

~~PROPOSED~~ ORDER - 2

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